

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZDENKO JAKIŠA,

Defendant.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**INDICTMENT**

18 U.S.C. § 1546(a)

CR 14-119 SRN/SER

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

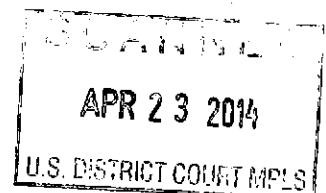
(Possession of Unlawfully Obtained Documents)

On or about April 17, 2014, in the State and District of Minnesota, the defendant,

**ZDENKO JAKIŠA,**

did knowingly possess a document prescribed by statute and regulation as evidence of authorized stay and employment in the United States, that is a Permanent Resident Card (an I-551), commonly referred to as a "Green Card," which the Defendant knew to have been procured by means of materially false claims and statements and otherwise unlawfully obtained, in that in response to oral and written questions during his refugee and legal permanent resident applications, Defendant failed to reveal:

- a. He was a member of the *Hrvatsko Vijeće Odbrane* ("HVO") (the armed forces of the Croatian Defense Council in Bosnia and Herzegovina ("Bosnia")) during the Bosnian Conflict;
- b. He had been arrested, charged, indicted and imprisoned for breaking or violating the law in Bosnia; and



c. He had committed crimes of moral turpitude in Bosnia.

In violation of Title 18, United States Code, Section 1546(a).

A TRUE BILL

---

UNITED STATES ATTORNEY

---

FOREPERSON